



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 5, 2000

Reply To

Attn Of:

WCM-128

Dr. Gary Livingston, Superintendent
Spokane School District 81
200 North Bernard Street
Spokane, Washington 99201-0282

Mr. Donald Hurst, President
Fulcrum Environmental Consulting, Inc.
Carnegie Square
107 South Cedar
Spokane, Washington 99204

Re: Polychlorinated Biphenyl (PCB) Remediation at Spokane School District Self-Implementing Remediation Under 40 CFR § 761.61(a)
Priority 1 Facilities: Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, Bancroft BI/CAPE Preschool, Finch Elementary School, and Maintenance Facility.

Dear Dr. Livingston and Mr. Hurst:

We have reviewed your May 15, 2000, Remediation Plan, for Polychlorinated Biphenyl (PCB) sampling, cleanup and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs in Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, and Rogers High School, and from improper storage of PCBs at the Spokane School District Maintenance Facility. In addition, your PCB Remediation Plan should also include the following schools in the Priority 1 listing: Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, Bancroft BI/CAPE Preschool, Finch Elementary, and part of the Spokane Maintenance Facility, as these schools and facilities have been identified as possible locations for current and past leaking fluorescent light ballasts.

Your proposed PCB cleanup plan for Spokane School District 81 Priority 1 Facilities, as described in your May 15, 2000 letter, including the Sacajawea Middle

School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, Bancroft BI/CAPE Preschool, Finch Elementary, and part of the Spokane School Maintenance Facility, is acceptable to EPA Region 10. The EPA does not accept your Draft PCB Remediation Plan and schedule for the Priority 2-6 facilities at this time. The Spokane School District may submit a risk based PCB remediation assessment to EPA Region 10 under 40 CFR § 761.61(c) and/or a request under 40 CFR § 761.79(h) for approval of sampling and analysis of PCBs which does not conform to the requirements of 40 CFR § 761.61(a). As stated in your plan, the Spokane School District 81 and Fulcrum Environmental Consulting, Inc., have agreed to perform the actions listed below and our acceptance of the PCB cleanup proposal is conditional upon your agreement to the following:

1. The Spokane School District 81 and Fulcrum Environmental Consulting Inc., will complete the following by August 15, 2000:
 - a. The complete remediation of Priority 1 Facilities including the Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, and Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, Bancroft BI/CAPE Preschool, Finch Elementary School, and part of the Spokane School Maintenance Facility, in accordance with 40 CFR § 761.61(a). This remediation will include all leaking fluorescent light ballasts at the Priority 1 Facilities.
 - b. Utilize decontamination solvents, as applicable, in accordance with 40 CFR § 761.79(c).
 - c. The removal of all PCB remediation waste from the Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, and Bancroft BI/CAPE Preschool.
 - d. The disposal/incineration of all PCB remediation waste, from the Ferris High School, Shadle Park High School, Shaw Middle School,

Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, and Bancroft BI/CAPE Preschool, with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR §§ 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

- e. **The disposal/incineration of all PCB remediation waste, from the Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, and Bancroft BI/CAPE Preschool, with a PCB concentration of \geq 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).**
- f. **The disposal/incineration of all PCB bulk product waste, including fluorescent light ballasts containing PCBs in the potting compound, from the Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, and Bancroft BI/CAPE Preschool in accordance with 40 CFR §§ 761.62(a)(1) - (7).**

- g. **Provide copies of Certificates of Disposal for the disposal of the PCB wastes.**
 - h. **Provide copies of Certificates of Destruction for the incineration of the PCB wastes.**
 - i. **The identification on all appropriate facility drawings the location of capacitors/ballasts/transformers observed as leaking and remediated at the Ferris High School, Shadle Park High School, Shaw Middle School, Glover Middle School, Rogers High School, Browne Elementary School, Franklin Elementary School, Havermale Alternative High School, Lidgerwood Elementary School, Lincoln Heights Elementary School, Pratt Elementary School, Ridgeview Elementary School, Libby Center, Sacajawea Middle School, Jefferson Elementary School, Hutton Elementary School, Adams Elementary School, Mullan Road Elementary School, and Bancroft BI/CAPE Preschool. Any additional leaking ballasts will be remediated in accordance with the PCB remediation plan.**
 - j. **Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).**
 - k. **Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).**
 - l. **Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).**
 - m. **Request alternative decontamination or sampling approval as applicable in accordance with 40 CFR § 761.79(h).**
 - n. **Provide a copy of the PCB Remediation characterization plan in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2) to EPA Region 10 no later than June 30, 2000.**
2. **The Spokane School District 81 and Fulcrum Environmental Consulting, Inc., will complete the following sampling and removal:**
- a. **If it is determined that soil below the Spokane School District PCB storage area may have been contaminated with PCB waste, the soil shall be sampled as soon as the entry to the soil below the PCB**

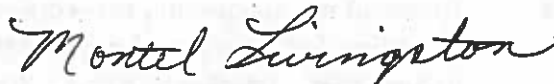
Storage area is deemed safe during the excavation. This sampling will occur no later than June 30, 2000.

- b. On July 15, 2000, upon receiving the sampling results, a preliminary report will be submitted to EPA providing the results and a schedule for removing the soil and asphalt that exceeds 1 ppm PCBs from the PCB Storage area. The PCB soil and PCB waste will be removed by July 30, 2000.
 - c. The removal of PCB contaminated asphalt and soil from the PCB storage area to less than 1 ppm PCBs in accordance with 40 CFR § 761.61(a).
 - d. Disposal requirements, record keeping, and PCB verification sampling for all soil and asphalt that is PCB waste will be conducted in accordance with 1.g, 1.h, 1.i, 1.j and 1.k of this letter.
3. The Spokane School District 81 and Fulcrum Environmental Consulting, Inc., will provide to EPA Region 10 and the Washington State Department of Ecology (WDOE) a final report documenting the completion of the above items. This report will be provided no later than August 28, 2000 for the PCB remediation. This report will also include:
- a. The results of soil and asphalt sampling and disposal. If a determination is made that soil and asphalt sampling is not required, the basis of that determination will be provided.
 - b. The results of the removal of all soil and asphalt to less than 1 ppm PCBs.
 - c. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by Spokane School District 81, as well as the Washington State Department of Ecology.
 - d. Information on the number of staff and students in each room/location that was remediated.
 - e. Information regarding the specific PCB remediation methods including the specific solvents under 40 CFR § 761.79(d) used to remediate the PCBs in the Spokane School District 81 schools.

This determination by EPA does not obviate the Spokane School District 81 from the responsibility to comply with requirements of other federal laws and applicable Washington State requirements under the Washington Administrative Code (WAC) for Polychlorinated Biphenyls (PCBs).

If you have any questions, please contact Daniel Duncan, Regional PCB Program Manager, of my staff. He can be reached at EPA Region 10, Office of Waste and Chemicals Management, M/S WCM-128, 1200 Sixth Avenue, Seattle, Washington 98101; Telephone (206) 553-6693. If you have any questions on PCB sampling methods, please contact Dr. Bruce Woods, Office of Environmental Assessment, at (206) 553-1193.

Sincerely,



**Montel Livingston, Manager
Solid Waste and Toxics Unit**

**cc: Mr. Joe Madson, Safety & Risk Management Director
Spokane School District 81**